

COPY

**VIRGINIA:
IN THE CIRCUIT COURT FOR LOUISA COUNTY**

ELIZABETH T. BASHAM,

Plaintiff,

v.

Case No. CL22-058

WAL-MART STORES EAST, LP,

**SERVE: C T CORPORATION SYSTEM, Registered Agent
4701 Cox Road, Suite 285
Glen Allen, VA 23060
(Henrico County)**

AND

WAL-MART STORES EAST, INC.

**Serve: Beverly L. Crump, Registered Agent
Bank of America Center, 16th Floor
1111 East main Street
Richmond, VA 23219
(Richmond City)**

AND

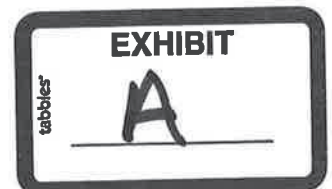
WALMART INC.

**SERVE: C T CORPORATION SYSTEM, Registered Agent
4701 Cox Road, Suite 285
Glen Allen, VA 23060
(Henrico County)**

AND

WAL-MART,

Defendants.



COMPLAINT

Plaintiff, Elizabeth T. Basham, by counsel, states as follows for her Complaint against Wal-Mart Stores East, LP; Wal-Mart Stores East, Inc.; and, Walmart Inc. (hereinafter, collectively, "Defendant"):

1. Defendant was at all relevant times the owner and/or occupant and/or operator and/or manager of a Walmart store located in Hanover County, Virginia.

2. Defendant was at all relevant times the owner and/or occupant and/or operator and/or manager of a Walmart store located in Louisa County, Virginia.

3. Walmart regularly conducts substantial business activity in Louisa County.

4. Plaintiff Elizabeth T. Basham, who at all relevant times is a resident of Louisa County, was a customer at the Walmart store located in Hanover County on the date of the accident and at all relevant times was in the status of an invitee of the store.

5. On or about August 19, 2017, Plaintiff was a customer of the Hanover Walmart store. As she was departing through the store's entrance/exit, she slipped and fell on a liquid substance.

6. It was the duty of Wal-Mart to use reasonable care in managing, inspecting, designing, configuring, leasing, clearing, cleaning and maintaining the premises, and to use ordinary care to have the premises in a reasonably safe condition, and to use ordinary care to correct or warn an invitee of any unsafe condition that Walmart knew or should have known about.

7. The liquid on the floor constituted a dangerous, unsafe, and unusual condition on Walmart's property, and Walmart was aware and had notice, both actual and constructive, of the dangerous, unsafe and unusual condition, and Plaintiff slipped and fell as a result of the dangerous, unsafe, and unusual condition.

8. The plaintiff's fall was directly and proximately caused by carelessness, recklessness and negligence of Walmart in managing, inspecting, clearing, cleaning and maintaining the premises, and in Walmart's failure to use ordinary care to have the premises in a reasonably safe condition and failure to warn the plaintiff of the dangerous, unsafe, and unusual condition.

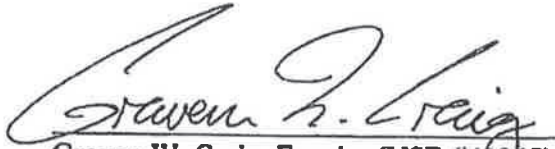
9. As a direct and proximate result of the aforesaid negligence of the defendants, jointly and severally, the aforementioned accident occurred and plaintiff suffered the following damages: severe and permanent injuries; lost wages, including, past, present, and possibly suffer in the future; physical pain and mental anguish, including past, present, and that which she may reasonably be expected to suffer in the future; inconvenience, including past, present, and that which she may reasonably be expected to suffer in the future; medical expenses, including past, present, and that which she may reasonably be expected to suffer in the future; permanent disability; and has otherwise been damaged.

WHEREFORE, the plaintiff, Elizabeth T. Basham, respectfully prays for judgment, jointly and severally, and an award of execution against the defendant, in the sum of \$750,000.00 plus pre-judgment interest from August 19, 2017, plus costs and other relief as may be warranted.

Trial by jury is demanded.

ELIZABETH T. BASHAM

By counsel

A handwritten signature in black ink, appearing to read "Graven W. Craig", is written over a horizontal line.

Graven W. Craig, Esquire (VSB #40357)

Rea T. "Torrey" Williams, Esquire (VSB# 84691)

Craig Williams, PLC

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